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2	RYAN VENCI, ESQ.
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9	

Defendants.

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

SEDIK KHODABAKHSH, an individual,	CASE NO.: 2:25-cv-450-JAD-NJK			
Plaintiff,				
VS.	STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER			
vs.	AND SCHEDULING ORDER			
ALBERTSON'S, LLC d/b/a ALBERTSON'S; a Foreign Limited Liability Company; and	SUBMITTED IN COMPLIANCE WITH LR 26-1(B)			
DOES I-V and ROE CORPORATIONS VI-X;	WITH LR 20-1(B)			
inclusive,				

Pursuant to Local Rules 26-1(b), the parties respectfully submit the following stipulated discovery plan and jointly request that the Court: 1) approve this plan, and 2) implement the plan as a scheduling order. The FRCP 26(f) conference was held on March 25, 2025, by CRAIG W. DRUMMOND, ESQ., for Plaintiff, SEDIK KHODABAKHSH, and RYAN VENCI, ESQ., for Defendant, ALBERTSON'S, LLC. The parties propose the following discovery plan:

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1.	Subjects on which discovery	y ma	y be needed	(Fed.]	R. Civ.	P. 26(f)(3)	(\mathbf{A}))

Discovery will be needed on the facts and circumstances surrounding the allegations in the complaint, namely the issues of Defendant's liability and damages suffered by Plaintiff.

2. **Discovery Cut-Off Date (Fed. R. Civ. P. 26(f)(3)(A), LR 26-1(b)(1)):**

a) Date of Defendant's answer or appearance (LR 26-1(b)(1)):

Defendant filed its Notice of Removal on March 12, 2025. Defendant ALBERTSON'S LLC filed its Answer in the Eighth Judicial District Court for the State of Nevada on February 3, 2025.

b) Statement of the reasons why longer or different time periods should apply to the case (LR 26-1(a)):

Not applicable.

c) Proposed discovery cut-off (LR 26-1(b)(1)):

Consistent with § 2(a) above, discovery shall close on: Monday September 8, 2025 (180 days from the date of Defendant's first appearance before this Court).

3. Amendment of Pleadings and Adding Parties (LR 26-1(b)(2)):

Motions to amend pleadings and add parties shall be filed no later than ninety (90) days before the close of discovery: Tuesday June 10, 2025.

4. Disclosures (Fed. R. Civ. P. 26(f)(3)(A); LR 26-1(b)(3)):

a) Initial disclosures:

Initial disclosures shall occur on or before: Monday April 7, 2025.

b) Initial expert disclosures:

Pursuant to Fed. R. Civ. P. 26(a)(2)(D)(i), initial expert disclosures shall be due no later than sixty (60) days before the close of discovery: **Thursday July 10, 2025.**

c) Rebuttal expert disclosures:

Pursuant to Fed. R. Civ. P. 26(a)(2)(D)(ii), rebuttal expert reports shall be due no later than thirty (30) days before the close of discovery: Friday August 8, 2025.

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5. <u>Dispositive Motions (LR 26-1(b)(4)):</u>

The deadline for filing dispositive motions shall be thirty (30) days after the close of discovery: **Wednesday October 8, 2025.**

6. <u>Joint Pre-Trial Order (LR 26-1(b)(5), (6)):</u>

The joint pre-trial order shall be filed no later than thirty (30) days after the date set for filing dispositive motions: **Friday November 7, 2025.** The joint pre-trial order shall include the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them.

7. <u>Alternative Dispute Resolution (LR 26-1(b)(7)):</u>

Counsel for the parties certify that they met and conferred about the possibility of using alternative dispute resolution including mediation, arbitration and/or an early neutral evaluation. The parties agree that an early neutral evaluation would not be effective at this time as the parties and their counsel believe that it is necessary to conduct discovery before attempting to resolve this case. Counsel further agree that a settlement conference will be beneficial after discovery is concluded. Finally, the parties and their counsel are not interested in submitting this case to arbitration.

8. Alternative Forms of Case Disposition (LR 26-1(b)(8)):

The parties certify that they have considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01) but do not consent to those forms of dispute resolution at this time.

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9. Electronic Evidence (LR 26-1(b)(9)):

The parties certify that they have discussed and intend to use electronic evidence at the trial of this matter and will ensure that said evidence is in an electronic format compatible with the Court's electronic jury evidence display system. At present, the parties have not agreed upon any stipulations regarding use of electronic evidence but will address this issue again in the Pre-Trial Order.

DATED this 11th day of April, 2025.

DATED this 11th day of April, 2025.

CRAIG W. DRUMMOND. ESO.

BRANDON | SMERBER LAW FIRM

DRUMMOND LAW FIRM

Nevada Bar No. 11109

/s/ Lew Brandon, Jr., Esq.

/s/ Craig W. Drummond, Esq.

LEW BRANDON, JR., ESQ.

Nevada Bar No. 5880

RYAN M. VENCI, ESQ.

Nevada Bar No. 7547

KRISTEN MOLLOY, ESQ.

Nevada Bar No. 14927 139 E. Warm Springs Road Las Vegas, Nevada 89119 Attorneys for Defendant,

ALBERTSON'S LLC

JOSEPH A. TUTONE, ESQ. Nevada Bar No. 16333 3325 West Sahara Avenue Las Vegas, Nevada 89102 Attorneys for Plaintiff, SEDIK KHODABKHSH

ORDER

IT IS SO ORDERED

DATED this 11th day of April, 2025.

UNITED STATES MAGISTRATE JUDGE